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*Counsel for Daniel Ratzlaff, Patricia
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Michelle McConnell, Carlota Onofre, and
Teleso Satele, individually and putative
class representatives*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|---|---|-------------------------|
| In re: |) | |
| |) | Chapter 11 |
| MOTORS LIQUIDATION COMPANY, <i>et al.</i> , |) | |
| f/k/a General Motors Corp., <i>et al.</i> , |) | Case No.: 09-50026 (MG) |
| |) | |
| Debtors. |) | (Jointly Administered) |
| |) | |

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that, pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101, et seq. (the “Bankruptcy Code”), the undersigned hereby appear in the above-captioned chapter 11 cases (the “Chapter 11 Cases”) as counsel for Daniel Ratzlaff, Patricia Barker, Sylvia Benton, Nicole Heuler, Katie Michelle McConnell, Carlota Onofre, and Teleso Satele, individually and as putative class representatives (collectively, the “Plaintiffs”), and the Plaintiffs are parties in interest in this proceeding, and, pursuant to Bankruptcy Rules 2002, 3017(a) and 9007, hereby request that all notices given or required to be given and all papers and pleadings served or required to be served in these Chapter 11 Cases (including, all

papers filed and served in all adversary proceedings in these Chapter 11 Cases), whether sent by the Clerk of the Court, the Debtors or their successors, or any creditor, committee, or party in interest, be given to and served upon the persons set forth below, and that such names and addresses be added to any master mailing list:

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PLEASE TAKE FURTHER NOTICE that this request includes not only the notices, papers and pleadings referenced in the above-referenced Bankruptcy Rules but also, without limitation, orders on and notices of any motion, application, petition, pleading, or complaint, whether formal or informal, written or oral, transmitted or conveyed by mail, telephone, telecopy, or otherwise in these Chapter 11 Cases.

PLEASE TAKE FURTHER NOTICE that neither this request for notice nor any subsequent appearance, pleading, proof of claim, or other writing or conduct shall constitute a waiver of any: (a) rights to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Court; (b) rights to trial by jury in any proceeding as to any and all matters so triable; (c) rights to have the reference withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and (d) other rights, claims, actions, defenses, setoffs, recoupments, or other matters under any agreement, law or equity. All of such rights hereby are reserved and preserved without

exception and with no purpose of confessing or conceding jurisdiction in any way by this filing
or by any other participation in these Chapter 11 Cases.

Dated: New York, New York
February 11, 2021

BROWN RUDNICK LLP

/s/William R. Baldiga

William R. Baldiga

Andrew P. Strehle

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